

REMARKS

This paper is filed to supplement the response to the Office Action mailed 20th May 2008. Claims 1- 3, 5- 15, 18- 23, 25 and 26 were pending in the application. No claims have been amended or cancelled. Therefore, claims 1- 3, 5- 15, 18- 23, 25 and 26 are resubmitted for consideration.

Rejection of Claim 6:

Claims 6 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Dawson in view of Ishihara or Masuda and further in view of Teumer.

The Examiner is thanked for bringing the omitted matter to Applicant's attention. The following remarks are intended to fully address all remaining issues.

In the earlier submission dated 20th August 2008, it has been explained how Dawson teaches the use of relatively large jets of from 0.2 to 2 mm in diameter (see page 3, line 3 to 5). The jets fire pulses of 2 to 30 millisecond duration. Such delivery is consequently very coarse and for this reason is probably adequate only for patterning of the disclosed carpet tiles. In this context there would therefore be little need to affix the tiles to the belt since the fineness of the image would not be significantly increased.

Furthermore it was explained that a combination of Dawson with either Masuda or Ishihara would not result in a method for upgrading textile articles including at least two steps of painting, coating or finishing. Masuda and Ishihara relate to the printing of cloth or fabric using colored dyes or ink and thus the person of ordinary skill would only consider adapting Dawson to include an affixing step in the light of these documents for the purpose of printing. In the case of painting, coating or finishing, the skilled person would see no benefit in this additional complexity.

Claim 6 additionally requires generating per nozzle at least 100,000 droplets per second. The Examiner has suggested that it would be obvious for the person of ordinary skill to take the teachings of Teumer and apply them to arrive in an obvious manner at the subject-matter of claim 6.

In response hereto, it must first be noted that Teumer does not disclose the step of affixing a textile article to a conveyor to prevent relative movement. According to Teumer at column 6, line 6 to line 14, the target 4 (apparently paper – see column 9, line 20) is transported by frictional engagement with wheels 39. It is thus not affixed thereto. Teumer

thus teaches away from the present invention and the person of ordinary skill on consulting this citation would understand that affixing of an article to a conveyor was not necessary even at high deposition rates.

It is furthermore contested that the person of ordinary skill in the field of coating, painting (full-font dyeing) and finishing cloth would seek to adopt the teaching of Teumer. The Examiner has suggested that the person of ordinary skill would look to Teumer to compensate for distortion in a scan or print line due to relative motion of a drop generator. This problem has however apparently only been identified in previous electrostatically deflecting systems (see Teumer at column 1, line 25 to line 28). This problem would thus not have been present in devices such as Miller and Dawson and there would thus have been no reason for the person of ordinary skill to consult Teumer. For the avoidance of doubt, the relative movement between nozzle and target referred to in Teumer is in no way related to the relative movement of a cloth and conveyor due to distortion of the cloth.

Teumer would also have been most inappropriate as a solution to problems identified in Miller and Dawson. Teumer relates to a printing system i.e. a device for marking a discrete pattern of droplets onto a carrier or target, apparently paper, to e.g. impart information. This field of endeavor may be considered to be generally distant from the present field of the invention. As described in the present description, the operations of coating, painting and finishing have been hitherto performed by traditional procedures using e.g. baths and rollers. Miller and Dawson consider the use of jetting devices primarily for the purpose of patterning or printing onto textiles such as carpets. The type of dye solutions used in Miller and Dawson are totally distinct from the ink used in the field of graphical printing onto paper. The acid dye solutions suggested in Miller (example 1) would be totally unsuitable for use in the device of Teumer which requires electrostatic charging of the droplets. Equally, the ink of Teumer would not be suitable for performing the operations contemplated by Miller or Dawson. Furthermore, Teumer would be unsuitable for applying the volumes of fluid required by Miller and Dawson for effectively patterning a carpet (50 ml/min/applicator see Miller at col 5, line 53). The device of Teumer is understood to deliver at most 5 ml/min/applicator based on the described droplet size and maximum frequency.

For all of these reasons, Applicant submits that claim 6 is also non-obvious over the cited references.

The Examiner is respectfully requested to reconsider the rejection and allow claims 1-3, 5- 15, 18- 23, 25 and 26.

Any extension of time that may be deemed necessary to further the prosecution of this application is hereby requested. The Commissioner is authorized to charge any fees which may be required, or credit any overpayment, to **Deposit Account No. 08-3038**, referencing the docket number shown above.

The Examiner is respectfully requested to contact the undersigned in order to resolve any questions.

Respectfully submitted,

/J.C. Rasser/

Jacobus C. Rasser Date: 8 December 2008
Reg. No. 37, 043

Customer No. 32,894
Howrey LLP
2941 Fairview Park Drive, Suite 200
Falls Church, VA 22042
Fax: 202-383-7195
Tel: 011-31-20-5924411